

**DFC-OHRM-001-007**

## **Anti-Harassment Policy**

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## 1. PURPOSE AND COVERAGE

This policy creates the DFC's program on providing a work environment free from harassment by (1) defining unacceptable conduct that violates this policy; (2) outlining the rights and responsibilities of employees, supervisors, and managers; (3) establishing reporting procedures and accountability measures; and (4) establishing the Anti-Harassment Program Team (AHPT). These procedures ensure that appropriate officials are notified of, and have the opportunity to promptly correct, harassing conduct.

This policy applies to all employees within all offices of the DFC and supersedes any other DFC policy or procedures that conflict with this policy. DFC is committed to taking all necessary actions, within its authority, to provide a work environment free of harassment.

This policy is not intended to, and does not create any right or benefit, substantive or procedural, enforceable by law or equity by a party against the United States, agencies, instrumentalities or entities, its officers or employees, or any other person.

## 2. DEFINITIONS

- **Anti-Harassment Program Team.** The Vice President, Office of Human Resources Management (VP OHRM) and Chief Human Capital Officer (CHCO) determines the members of the AHPT. The Team is normally comprised of officials from the Workforce Relations and Benefits, and the Office of General Counsel. The AHPT provides advice to managers and supervisors on matters relating to harassment allegations.
- **Hostile Work Environment.** A pattern of continuing unwelcome behavior that unreasonably interferes with an employee's work performance or that creates an intimidating, hostile, or offensive work environment.
- **Prohibited Harassing Conduct.** The conduct prohibited by this policy includes conduct that meets the legal definitions of harassment or sexual harassment, as well as harassing conduct that violates the dignity and respect of others.

Illegal harassing conduct prohibited by this policy is defined as any unwelcome or unwanted conduct, verbal or physical, based on an individual's protected status or protected activities, that is sufficiently severe or pervasive so as to create a work environment that a reasonable person would consider intimidating, hostile or abusive, to include, but not limited to, when:

1. the behavior can reasonably be considered to adversely affect the work environment; or
2. an employment decision affecting the employee is based upon the employee's acceptance or rejection of such conduct.

Other harassing behavior that does not meet the legal definition of illegal harassment is also prohibited under this policy. Examples of this include, but are not limited to, unwelcome conduct (including of a sexual nature), intimidation, ridicule, insult, offensive comments or jokes, bullying, stalking, slurs, epithets, negative stereotyping, offensive objects or pictures, threats, unwelcome sexual advances, and requests for sexual favors.

Harassing conduct can occur in person, in writing, or through phone calls or other forms of technology or social media.

- **Protected Status.** Protected Status is based on race, religion, color, sex (with or without sexual conduct and including pregnancy, sexual orientation, transgender status/gender identity, and sex-stereotyping), national origin, retaliation, age (40 years or older), disability (mental and/or physical) and/or genetic information. In addition, all employees and applicants are to be free from harassment without regard to parental status, marital status and/or political affiliation.
- **Responsible Management Official.** The Responsible Management Official is the DFC management official, appointed by the VP OHRM & CHCO in consultation with the AHPT. The Responsible Management Official, in consultation with the AHPT, is responsible for overseeing investigations into allegations of harassment, reviewing reports of investigation, and ensuring immediate and appropriate discipline or adverse action is taken against individuals who are in violation of this policy.
- **Retaliation/Reprisal.** Retaliation/ Reprisal occurs when an employer takes an adverse action because an applicant or employee asserts rights protected by the EEO laws, including but limited to: filing or being a witness in an EEO charge, complaint, investigation, or lawsuit; communicating with a supervisor or manager about employment discrimination; answering questions during an employer investigation of alleged harassment; refusing to follow orders that would result in discrimination; resisting sexual advances, or intervening to protect others requesting accommodation of a disability or for a religious practice asking managers or co-workers about salary information to uncover potentially discriminatory wages.
- **Sexual Harassment.** A form of harassment that can include unwelcome sexual advances, requests for sexual favors, and/or other verbal or physical conduct of a sexual nature when (a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

### **3. ROLES AND RESPONSIBILITIES**

#### **3.1 VICE PRESIDENT, OHRM AND CHIEF HUMAN CAPITAL OFFICER (CHCO)**

- Disseminating this policy to all employees on an annual basis and periodically reminding employees of their responsibilities under this policy.
- Ensuring that performance plans of all supervisors and managers include a critical element that would rate their performance on taking appropriate action against employees for misconduct.
- Providing information to the Office of the Chief Executive Officer (CEO) on allegations of misconduct under this policy and the necessary corrective action taken, if any.
- Resolving any disagreements involving investigations between management officials and consulting staff from the Office of Human Resources Management Offices or the Anti-Harassment Program Team regarding whether and what type of investigation is necessary.
- Determining the composition of the Anti-Harassment Program Team and assigning the role of Responsible Management Official in consultation with the AHPT.

#### **3.2 OFFICE VICE PRESIDENTS**

- Ensuring that supervisors/managers are appropriately rated on the critical element regarding anti-harassment procedures.
- Ensuring that their subordinate employees are in full compliance with requirements of this policy.
- Monitoring the work environment following a report alleging a violation of this policy to ensure that there are no further violations or incidents of retaliation against any individual who has reported harassment or participated in the investigation.

#### **3.3 DIRECTOR, OFFICE OF EQUAL EMPLOYMENT OPPORTUNITY**

- Reporting allegations of harassing conduct received by the EEO Director to the AHPT as soon as possible, but no later than one business day after receipt of the allegations; and
- Advising alleged complainants of their rights under the EEO process.

#### **3.4 SUPERVISORY HR SPECIALIST (DIRECTOR, WORKFORCE RELATIONS AND BENEFITS (WRB)) – DIRECTOR WRB**

- Developing and providing periodic communications to all DFC employees on this policy and any DFC-specific requirements and incorporating this policy into the DFC's supervisory training curriculum.
- Providing oversight, technical assistance, and support to DFC staff to ensure compliance with this policy.

- Ensuring that the procedures in this policy are properly executed by monitoring inquiries and investigations of reported or otherwise discovered harassing conduct; providing guidance concerning the information to be gathered and methods to be used during inquiries and investigations; and otherwise ensuring that the investigations are swift, thorough, impartial, and appropriate to the allegation.
- Reviewing information on the harassing conduct allegations, and providing information to the CEO, EEO, and the CHCO as requested.
- Providing the record of actions taken under this policy to any office handling a parallel statutory or grievance claim.

### **3.5 HR SPECIALIST (EMPLOYEE AND LABOR RELATIONS (ER/LR))**

- Receiving reports alleging violations of this policy and notifying and assisting the relevant management officials in handling allegations of harassing conduct and taking corrective action, as appropriate and necessary.
- Documenting reports made and actions taken pursuant to this policy and reporting on them to the applicable parties.

### **3.6 ANTI-HARASSMENT PROGRAM TEAM (AHPT)**

Provides advice to managers and supervisors on matters relating to harassment allegations. The composition of the AHPT is determined by the VP OHRM & CHCO and will normally include representatives from the Office of Human Resources Management, Workforce Relations and Benefits and the Office of General Counsel. The AHPT is responsible for:

- Ensuring uniform and effective handling of all allegations submitted for review.
- Informing the appropriate supervisor or manager of allegations reported to the AHPT.
- Assisting supervisors and managers in determining the veracity of a complaint.
- Consulting with the Responsible Management Official to assist him or her in determining investigatory measures and, if needed, appointing a team to conduct inquiries into allegations of harassment on behalf of the agency; conducting further informal inquiries itself; and recommending or taking other appropriate inquiry action. The AHPT does not initiate disciplinary action(s).
- Advising management regarding unsubstantiated accusations of misconduct within the scope of this policy.
- Providing data to the Director, Workforce Relations & Benefits for tracking purposes.
- Reports allegations of harassment by a contract employee to the appropriate Contracting Official.

### **3.7 SUPERVISORS AND MANAGERS**

- Providing a work environment free of harassment.
- Ensuring that subordinates are aware of this policy and its requirements and that all training requirements are completed.
- Acting immediately and appropriately to stop known harassing conduct and hold employees who have engaged in harassing conduct accountable.
- Receiving reports alleging violations of this policy.
- Notifying the AHPT of reported or observed violations of this policy.
- Evaluating and holding accountable subordinate supervisors and managers of their actions under this policy.
- Protecting employees who report misconduct from retaliation.
- Taking appropriate action regarding fabricated or false allegations.
- Maintaining confidentiality where required.

### **3.8 EMPLOYEES**

- Refrain from engaging in harassing conduct.
- Participate in training required under this policy.
- Cooperate fully in any inquiry or investigation.
- Review their rights and responsibilities under this policy.

## **4. POLICY**

The DFC is committed to providing a work environment free of discrimination and harassment based on race, color, religion, sex (including pregnancy, sexual orientation, and gender identity), national origin, age, disability, genetic information (including family medical history), status as a parent, marital status, or political affiliation, and reprisal and retaliation. The DFC will not tolerate offensive sexual or non-sexual harassing behavior against any person, including but not limited to, any DFC employee, intern, volunteer, contractor or other non-Federal employee, visitor, or other member of the public. The DFC will take action, within its authority, to ensure an environment free from harassing conduct regardless of whether the parties responsible for, or affected by, the conduct are DFC employees.

The DFC also will not tolerate adverse treatment of or reprisal against employees because they report harassing conduct or provide information related to such complaints.

This policy provides guidance to ensure that the DFC supervisors/managers take immediate and appropriate corrective action, including appropriate disciplinary action, to eliminate harassing conduct regardless of whether the conduct rises to the level of a violation of law. Therefore, the goal of this policy is to address harassing conduct at the earliest possible stage, before it becomes “severe or pervasive,” i.e., harassment within the meaning of anti-discrimination law.

## 4.1 PROHIBITED HARASSING CONDUCT

Although not every instance of inappropriate behavior may meet the legal definition of harassment, any such behavior that undermines morale, work environment, and/or the DFC's mission is prohibited under this policy. Harassing conduct, as defined herein will not be tolerated and must be promptly reported and investigated in accordance with this policy.

## 4.2 REPORTING PROCEDURES AND REQUIREMENTS

DFC cannot correct harassing conduct if a supervisor, manager, or other DFC official is not aware of the behavior.

### 4.2.1. ALL EMPLOYEES

Any employee who has been subjected to harassing conduct is encouraged to inform the person(s) responsible for the conduct that it is unwelcome and offensive, and request that it cease. If the conduct continues, is severe, or if the employee is uncomfortable addressing the responsible person(s) about the conduct, the employee is encouraged to report the matter to:

1. the supervisor of the employee engaging in the misconduct;
2. any supervisor or manager;
3. the Office of Human Resources Management (OHRM);
4. the Office of the Inspector General (OIG);
5. the Office of Equal Employment Opportunity (EEO); or
6. the Anti-Harassment Program Team (AHPT) at [harassment@dfc.gov](mailto:harassment@dfc.gov)

Employees should report harassing conduct, including sexual misconduct, as soon as practicable after it occurs, but may report at any time, regardless of when the incident occurred. Reports made pursuant to this policy do not replace, substitute, or otherwise satisfy the separate obligations of an EEO complaint, negotiated grievance, or other complaint process. Unlike this policy, other complaint procedures typically have a required timeframe in which to file and provide for remedial relief to the complainants. **See Distinction from Statutory and Grievance Claims** for more information about how an employee may pursue rights under one of these separate processes, in addition to reporting the misconduct under this policy.

Consulting with a union representative to obtain advice or contacting the Employee Assistance Program, do not constitute a report under this policy, and do not trigger a responsibility to report under this policy. See **Additional Resources** for more information.



#### **4.2.2. SUPERVISORY EMPLOYEES**

Supervisors or managers who observe or are informed of allegations of harassing conduct must comply with the following reporting requirements:

1. report the conduct/allegations to the AHPT, even if the employee raising the allegation requests confidentiality, and
2. take steps to ensure that the harassing conduct is appropriately addressed to deter further misconduct, including taking disciplinary action, if appropriate.

#### **4.3 CONSEQUENCES OF HARASSING CONDUCT**

##### **4.3.1. ALL EMPLOYEES**

Employees are subject to disciplinary action, up to and including removal, for engaging in harassing conduct while in the workplace or in any work-related situation, including while on official travel. Off-duty misconduct may subject the employee to potential discipline if the misconduct is likely to have an adverse effect on the DFC (e.g., harassing a co-worker, visitor, contractor, or volunteer during off-duty hours). Harassing conduct can occur in person, through phone calls or in writing, or through the use of social media, or other forms of technology.

##### **4.3.2. SUPERVISORY EMPLOYEES**

Supervisors and management officials are held to the highest standards of conduct, are responsible for the environment they create and the example they set for all DFC employees. Appropriate corrective action, disciplinary or otherwise, up to and including removal, will be taken against any supervisor or other management official who fails to perform their obligations as set forth in this policy, including any failure to report known violations of this policy.

#### **4.4 RETALIATION**

It is a violation of this policy to retaliate against employees who engage in protected activity under this policy. Protected activity includes, but is not limited to, reporting harassing conduct, discrimination, or retaliation; filing a claim of harassment; providing evidence in any investigation; or intervening to protect others who may have suffered harassing conduct, discrimination or retaliation. A manager may not fire, demote, harass, transfer an employee impacted by the conduct or witness against his or her will, ignore or fail to communicate with an employee impacted by the conduct or witness, engage in verbal or physical abuse, or non-selection for an employment opportunity, or otherwise take any

personnel action against an individual for reporting an allegation of misconduct under this policy.

It is important that supervisors and managers protect employees who report alleged misconduct, and do not take any retaliatory personnel action against these individuals in order to deter reporting harassing conduct or filing a complaint. A supervisor or manager found to have engaged in retaliation is subject to disciplinary action.

The existence of an EEO complaint, grievance, or other procedure alleging harassment does not relieve a supervisor or manager of the duty to act under to this policy.

If an employee raises a claim of harassment through the EEO process, a Merit Systems Protection Board (MSPB) action, or a negotiated grievance, the DFC official who receives the claim will promptly, *i.e.*, within one business day, notify the AHPT. The official who receives the claim must treat the notice as a report under this policy, and must follow the steps outlined above, unless inconsistent with applicable regulatory or statutory requirements. Multiple inquiries into a given complaint may proceed in parallel. As noted above, consulting with a union representative to obtain advice or contacting the Employee Assistance Program do not constitute a report under this policy, and do not trigger a responsibility to report under this policy. See **Additional Resources** for more information.

Engaging in protected activity under this policy does not preclude otherwise appropriate personnel actions. Supervisors and managers can take personnel actions, including discipline and removal, if they are motivated by non-retaliatory and non-discriminatory reasons that would otherwise result in such consequences (e.g., transferring an employee for legitimate business reasons or closely monitoring the performance of an employee on a Performance Improvement Plan).

## **4.5 INITIAL RESPONSE TO REPORTS OF HARASSMENT**

### **4.5.1. INDIVIDUAL RECEIVING REPORT**

When an individual listed in this policy receives a report of, or becomes aware of, harassing conduct, they must **within one business day**:

1. Document the allegation in writing capturing as many specifics as possible. At a minimum, the supervisor must provide the name of the individual making the report, the employee alleged to have violated the policy, and the specific policy violation(s) alleged.
2. Acknowledge receipt of the report to the individual making the report.

3. Contact the AHPT at [harassment@dfc.gov](mailto:harassment@dfc.gov) or any member of the AHPT.
4. If the report is made outside of the regular business hours, act based on their best judgment to minimize any perceived risk of immediate harm and contact the AHPT as soon as normal business hours resume.

#### **4.5.2. RESPONSE BY AHPT TO REPORT OF HARASSING CONDUCT**

When the AHPT receives a report of harassing conduct, they must determine:

1. Whether the reported activity is potentially criminal in nature, and if so, report it to the Office of Inspector General or law enforcement;
2. Whether the reported activity poses a security risk, and if so, report it to the Insider Threat Security Hub;
3. Whether the conduct could be considered harassing conduct, and if so, follow the steps outlined in **Investigation and Findings**, consult with the CHCO to designate a responsible management official to be responsible for making the preliminary determinations and directing any further investigation as warranted.

#### **4.5.3. INTERIM MEASURES**

Before directing a thorough investigation into the allegations of misconduct, the Responsible Management Official must first consult with the AHPT and then take any necessary interim steps to ensure that the reported conduct does not continue. The interim measures taken will depend on the severity of the conduct alleged, but may include actions such as, but not limited to, the following:

1. Instructing the employee alleged to have violated the policy, in writing, that an allegation of misconduct has been made, that all misconduct must cease and desist immediately and to have no further contact or communications with the employee impacted by the conduct.
2. Preventing further contact between the employee alleged to have violated the policy and the employee impacted by the conduct, by taking the following actions as appropriate to the situation:
  - a. assigning the employee alleged to have violated the policy to a temporary detail;
  - b. moving the employee alleged to have violated the policy to another office space, desk or floor;

- c. requesting approval to place the employee alleged to have violated the policy on administrative or investigative leave.
- d. Issuing No Contact Instructions to the employee alleged to have violated the policy; or
- e. A reassignment, detail, etc., of the employee impacted by the reported conduct should only be taken if requested by that employee. To the extent possible, the Responsible Management Official should honor the employee's request.

## **4.6 INVESTIGATION AND FINDINGS**

### **4.6.1. CONDUCTING THE INVESTIGATION**

Investigation into reports of harassment will proceed as follows:

1. Within three business days of the receipt of the allegation, the Responsible Management Official will consult with the AHPT, which will determine whether and what type of investigation is required. These decisions are fact-specific and made on a case-by-case basis.
2. All information will be maintained on a confidential basis to the greatest extent possible, appropriately limited to officials and employees within the DFC with a need to know to carry out the purpose and intent of this policy. The maintenance of records and any disclosures of information from these records shall be in compliance with the Privacy Act of 1974, 5 U.S.C. § 552a.
3. If it is determined that an investigation is necessary, the AHPT will ensure that the investigative process is initiated within two business days, of the decision to begin an investigation.
4. The Responsible Management Official, in consultation with the AHPT, will determine the appropriate investigating office. A member of the AHPT will serve as the primary point of contact for logistics related to the investigation. Investigators can include, for example:
  - a. The Office of Inspector General, for allegations of criminal activity, allegations implicating a DFC executive, or other senior or prominent management official, or any OIG employee, and allegations tied to waste, fraud, or abuse of DFC funds and programs or violations of Federal ethics regulations.
  - b. An independent or third-party investigator, for allegations of harassing conduct of a sexual nature.
  - c. The Office of Human Resources Management, or the Office of General Counsel depending on the complexity and scope of the allegations and the availability of qualified investigators.
5. All investigations will be conducted promptly, impartially, and thoroughly, in a manner appropriate to the allegation and recommend

appropriate action to stop any alleged harassing conduct and prevent further incidents, including granting appropriate interim relief to the alleged victim while the allegations are being investigated.

6. All investigations will normally be complete within 30 calendar days.

#### **4.6.2. FINDINGS OF FACT AND REPORT OF INVESTIGATION**

1. A written summary of the inquiry shall be prepared by the assigned investigator. The summary shall be prepared promptly after completion of the inquiry and shall be submitted to the AHPT and the Responsible Management Official.
2. The summary of the inquiry or other documentation prepared under this procedure shall be kept confidential, to the extent possible. The maintenance of records and any disclosures of information from these records shall be in compliance with the Privacy Act of 1974, 5 U.S.C. § 552a. Information may be disclosed to defend the DFC in litigation to which the information may be relevant and necessary. Further, information may need to be disclosed to those officials and employees within the DFC with a need to know in order to carry out the purpose and intent of this issuance.
3. The AHPT in consultation with the Responsible Management Official, will promptly evaluate the evidence and advise on the appropriate actions to be implemented by the Responsible Management Official.

Where the inquiry establishes that a supervisor or manager did not properly carry out the responsibilities provided for under this guidance, the supervisor or manager will be subject to appropriate corrective action, in accordance with Disciplinary and Adverse Action Policy, up to and including removal.

#### **4.7 CORRECTIVE ACTION**

After review of the findings of the investigation, the Responsible Management Official must consult with the AHPT to determine whether any disciplinary or other corrective action would be appropriate or if the allegation should be closed with no finding of misconduct. Where the inquiry substantiates that an employee engaged in harassing conduct under this policy, the employee will be subject to immediate and appropriate corrective action, in accordance with Discipline and Adverse Action Policy. Corrective action may include discipline or adverse action up to and including removal from the Federal Service.

Decisions and, if necessary, corrective action will be made within 60 days of receiving notice of the harassment complaint.

#### **4.7.1. FINDINGS OF NO MISCONDUCT**

If the decision is made that the allegation should be closed with no finding of misconduct, the Responsible Management Official should document why no corrective action was warranted.

#### **4.7.2. FINDINGS OF MISCONDUCT**

If facts uncovered during the investigation or inquiry substantiate misconduct, the Responsible Management Official must propose disciplinary or corrective action. The proposed corrective action will be initiated immediately and appropriately, in accordance with DFC Policy. Corrective action may include counseling or any disciplinary action applicable to instances of misconduct, such as reprimand, suspension, demotion, or termination.

### **5. RECORDS MANAGEMENT AND CONFIDENTIALITY**

#### **5.1 MAINTAINING CONFIDENTIALITY**

Supervisors and managers must take action to investigate all allegations of harassing conduct, even if the employee raising the allegation requests confidentiality. All reports of harassing conduct and related information will be maintained on a confidential basis to the greatest extent possible. The identity of the employee alleging violations of this policy will be kept confidential, except as necessary to conduct an appropriate investigation into the alleged violations, to take appropriate disciplinary or corrective action, to comply with the reporting requirements of this policy, or when otherwise required by law.

The Responsible Management Official or investigating entity must notify the employee impacted by the conduct, in writing, about the completion of the process to the extent permitted under the Privacy Act. The reporting employee or the employee who was subject to the reported conduct may not be provided the outcome of any disciplinary action against the employee alleged to have violated the policy and may not be provided a copy of the fact-finding report.

If the investigation reveals no findings, the employee alleged to have violated the policy will be advised of the outcome, in writing. Appropriate disciplinary action will occur if the allegation is fully or partially substantiated.

#### **5.2 TRACKING ALLEGATIONS OF HARASSING CONDUCT**

The Director, Workforce Relations and Benefits is responsible for tracking the information related to the allegations of harassing conduct in separate case files, in accordance with established records management policies. The

Director, Workforce Relations and Benefits must monitor and record the status of allegations, including final resolution.

## **6. MISCELLANEOUS**

### **6.1 DISTINCTION FROM GRIEVANCES AND STATUTORY CLAIMS**

This policy and its reporting procedures are separate and distinct from the EEO process, which focuses on making employees whole after they have experienced discrimination (including harassment) by issuing remedial relief, such as compensatory damages. This policy does not change an employee's right to pursue redress through EEO or other available procedures. Corrective action taken under this policy does not provide the remedies available in the EEO process, negotiated grievance procedures, or any other processes. Reporting allegations of misconduct under this policy does not satisfy the requirements for filing an EEO complaint, negotiated grievance, or other procedure, nor does it modify the time limits for initiating those procedures.

An employee who chooses to pursue statutory or collective bargaining remedies for unlawful harassment must select one of the available forums as follows:

1. For an EEO complaint pursuant to 29 C.F.R. §1614 (available for all claims of illegal harassment other than those based on status as a parent, marital status and political affiliation), contact an EEO counselor in the Office of Equal Employment Opportunity within 45 calendar days from the most recent incident of alleged harassment (or personnel action, if one is involved), as required in 29 C.F.R. §1614.105(a)(1); or
2. For an appeal to the MSPB pursuant to 5 C.F.R. § 1201.22, file a written appeal with the Board within 30 days of the effective date of an appealable adverse action as defined in 5 C.F.R. §1201.3, or within 30 days of the date of receipt of the agency's decision, whichever is later.
3. Employees covered by the Collective Bargaining Agreement may file a grievance in accordance with the provisions of the Collective Bargaining Agreement.
4. For an appeal to the Office of Special Counsel (OSC) regarding claims of harassment related to marital status and political affiliation, pursuant to 5 U.S.C. §2302(b)(1) and (b)(10), file a written appeal with the OSC as described in 5 C.F.R. §1800.1 and on [www.osc.gov](http://www.osc.gov); or

## 6.2 ADDITIONAL RESOURCES

Employees who have experienced harassing conduct have multiple resources available that can provide assistance and advice. Engaging with the following resources does not constitute a report under this policy, as these entities do not have an obligation to inform management of allegations of harassing conduct:

1. Employee Assistance Program (EAP). The DFC EAP is an employee benefit program that helps employees with personal and/or work-related problems that may impact their job performance, health, and mental and emotional well-being. Information about EAP services is available on the [DFC EAP website](#); or by phone at 1-800-222-0364 (or 888-262-7848 if you are hearing-impaired).
2. Union Representative. Employees who are covered by the bargaining unit can consult with a union representative.

## 6.3 INQUIRIES

Any DFC employee or employee representative seeking further information concerning this policy may contact the Office of Human Resource Management or the Office of Equal Employment Opportunity.

## 7. REFERENCES

- Title VII of the Civil Rights Act of 1964 (Pub. L. 88-352) (Title VII), as amended
- The Age Discrimination in Employment Act of 1967
- The Rehabilitation Act of 1973, as amended under the Americans with Disabilities Act Amendments Act of 2008
- Genetic information under the Genetic Information Nondiscrimination Act of 2008
- Parental status under Executive Order 13152 (signed May 2, 2000)
- Marital status and political affiliation under the Civil Service Reform Act of 1978.
- Title 42 of the United States Code, Section 2000e through 16
- Title 29 of the United States Code, Section 633a and 791(f)
- Title 29 of the Code of Federal Regulations, Section 1604.11 and 1614
- Title 5 of the United States Code, Section 2302(b)(l) and (10)
- Title 5 of the United States Code, Chapter 75 and substantially similar authorities covering employees in alternate personnel systems
- Executive Order 11478, as amended
- US International Development Finance Corporation's Harassment Policy Statement, issued July 2021.



**APPENDIX A: VERSION CONTROL AND APPROVAL**

<b>Version Number</b>	<b>Effective Date</b>	<b>Summary of Changes</b>	<b>Section</b>
1.0.0	08/02/2022	Initial Release	N/A

**Approved by:**

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